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June 20, 2023



VIA ECF

Hon. Lorna G. Schofield
United States District Judge
Southern District of New York
500 Pearl Street
New York, N.Y. 10007

Re: Nexus Underwriting . Gables Transportation Inc.
Case No.: 23 Civ. 2475 (LGS)
CG File No.: 42.031723.01

Dear Hon. Schofield:

This office represents plaintiff, Nexus Underwriting (“Nexus”) in the above referenced matter and submits this joint status letter on behalf of all parties.

We effectuated service of the Summons and Complaint on defendant Gables Transportation Inc. (“Gables”) on June 6, 2023 and filed the Affidavit of Service via ECF on June 9, 2023. Gables time to answer the complaint is June 27, 2023.

We have spoken with counsel for Gables and the parties are considering the possibility of stipulating to transfer pursuant to 28 U.S.C.1404(a). We have also discussed possible early resolution of this case before incurring substantial litigation costs. In light of these factors, the parties respectfully request the Court’s indulgence in granting a short continuance of the Initial Pretrial Conference scheduled for June 28, 2023, and the submission of a proposed case management plan, to further explore either settlement or transfer.

Hon. Lorna G. Schofield
June 20, 2023
page 2

Your Honor's continued attention and patience in this regard is greatly appreciated.

Respectfully yours,

CARUSO GLYNN, LLC

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